

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

GOLDEN FORTUNE IMPORT &
EXPORT CORPORATION,

Plaintiff,

vs.

MEI-XIN (HONG KONG) LIMITED and
MAXIM'S CATERERS LIMITED,

Defendants.

Civil Action No. 22-01369 (JXN) (JRA)

**NOTICE OF CROSS-MOTION TO
DISMISS THE VERIFIED
COMPLAINT**

TO: Marisa Rauchway Sverdlov, Esq.
RAUCHWAY LAW
195 Fairfield Avenue #4D
West Caldwell, New Jersey 07006
(973) 314-9697

David M. Dugan, Esq.
CHIESA SHAHINIAN & GIANTOMASI PC
One Boland Drive
West Orange, New Jersey 07052
(973) 325-1500

PLEASE TAKE NOTICE that on March 25, 2022, or as soon thereafter as counsel may be heard, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, before the Honorable Julien Xavier Neals, Defendant Mei-Xin (Hong Kong) Limited and Maxim's Caterers Limited (together, "Defendants") will cross-move for an order dismissing the Verified Complaint of Plaintiff Golden Fortune Import & Export Corporation, and for all such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that Defendants will rely on the Brief, Declaration of YU Yuet Fun Alice and Declaration of Sarah Fehm Stewart, and all exhibits thereto, which have been filed under seal.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order and Certificate of Service are attached.

PLEASE TAKE FURTHER NOTICE that oral argument is respectfully requested.

Dated: March 21, 2022

DUANE MORRIS LLP

By: /s/ Sarah Fehm Stewart
Sarah Fehm Stewart
Mauro M. Wolfe
Vincent J. Nolan III
1037 Raymond Boulevard, Suite 1800
Newark, NJ 07102
Telephone: 973-424-2061
Fax: 973-556-1464
Email: sfstewart@duanemorris.com

Attorneys for Defendants Mei-Xin (Hong Kong) Limited and Maxim's Caterers Limited